

FILED

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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

) INFORMATION

Plaintiff,

3:11 CR 103
Cr. No.

) vs.

STACY SACKS, f/k/a STACY DICK,
and TIMOTHY FISHER,

Title 18, United States Code,
Section 2;
Title 29, United States Code,
Sections 439(c), 501(c)

Defendants.)

JUDGE ZOUHARY
MAG. JUDGE JAMES R. KNEPP II

COUNT ONE

The United States Attorney charges:

From in or about December 2007, to in or about June 2009, in the Northern District of Ohio, Western Division, defendants STACY SACKS, formerly known as, STACY DICK, and TIMOTHY FISHER, while officers, that is, president and vice-president, respectively, of United Steelworkers of America, AFL-CIO, Local 982, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to their own use the moneys, funds, securities, property, and other assets of said labor organization to wit:

ORIGINAL

- i. Defendants DICK and FISHER caused union checks to be issued to themselves totaling \$3,257.26 and \$720.30, respectively, purportedly for lost wages while conducting union business, when in fact they did not lose wages;
- ii. Defendant DICK caused union checks to be issued to herself totaling \$4,329.50, which she falsely recorded in the union records as payments to third parties for union expenses;
- iii. Defendants DICK and FISHER caused union checks to be written to FISHER totaling \$4,137.91, for which there was no authorization or legitimate union expense;
- iv. Defendant DICK embezzled \$153.00 in cash of union funds;
- v. Defendants DICK and FISHER used union funds in the amount of \$1,520.77, to purchase a 42" flat screen television and home theater system for their personal use; all in violation of Title 29, United States Code, Section 501(c) and Title 18, United States Code, Section 2.

COUNT TWO

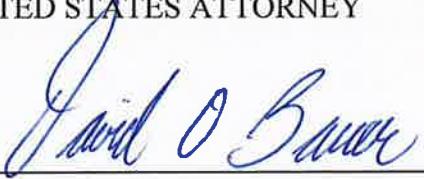
The United States Attorney further charges:

1. At all times material to this Information, United Steelworkers of America, AFL-CIO, Local 982, was a labor organization in an industry affecting commerce within the meaning of Sections 402(i) and 402(j) of Title 29, United States Code.
2. From in or about May 2008, to in or about September 2008, in the Northern District of Ohio, Western Division, the defendant STACY SACKS, formerly known as, STACY DICK, did willfully make and cause to be made false entries on financial records, which records were on matters required to be maintained and reported in the union's Form LM-3 Labor Organization Annual Report; that is, defendant falsely entered fictitious payees for checks in which the actual

payee was the defendant STACY DICK; all in violation of Title 29, United States Code, Section 439(c).

STEVEN M. DETTELBACH
UNITED STATES ATTORNEY

By:


DAVID O. BAUER
Attorney in Charge, Criminal Division
Toledo Branch Office